

1 UNITED STATES DEPARTMENT OF JUSTICE  
CIVIL DIVISION  
2 JEFFREY BOSSERT CLARK  
Acting Assistant Attorney General  
3 RUTH A. HARVEY  
Director  
4 KIRK MANHARDT  
Deputy Director  
5 MATTHEW J. TROY (GABN 717258)  
Senior Trial Counsel  
6 P.O. Box 875  
Ben Franklin Station  
7 Washington, DC 20044-0875  
Telephone: (202) 514-9038  
8 E-mail: matthew.troy@usdoj.gov

9 DAVID L. ANDERSON (CABN 149604)  
United States Attorney

10 Attorneys for the United States of America

11  
12 **UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
13 **SAN FRANCISCO DIVISION**

14 **In re:** )  
15 ) Bankruptcy Case  
16 **PG&E CORPORATION** ) No. 19-30088 (DM)  
17 )  
18 **- and -** ) Chapter 11  
19 )  
20 **PACIFIC GAS AND ELECTRIC** ) (Lead Case)  
21 **COMPANY,** )  
22 ) (Jointly Administered)  
23 **Debtors.** )  
24 ) Judge: Hon. Dennis Montali  
25 ) RE: Docket No. 9563  
26 )  
27 ☐ Affects PG&E Corporation )  
28 ☐ Affects Pacific Gas and Electric Company )  
☒ Affects both Debtors )  
*All papers shall be filed in the Lead Case,* )  
*No. 19-30088 (DM).* )

24 **RESPONSE OF THE UNITED STATES OF AMERICA TO COURT'S ORDER**  
25 **EXTENDING DEADLINE FOR THE REORGANIZED DEBTORS**  
26 **TO OBJECT TO CLAIMS**

27 The United States of America, on behalf of various federal agencies, hereby files this response  
28 to the Court's *Order Extending Deadline for the Reorganized Debtors to Object to Claims* [Dkt. No.

9563] (the “Order”), dated November 17, 2020.<sup>1</sup>

Paragraph 4 of the Order provides a deadline, subject to further extension, of March 31, 2021, for the Reorganized Debtors to object to United States Claims, which the Order defines as “Class 4B Utility General Unsecured Claims of the United States that are identified by claim number and amount in a writing filed with this Court and served on the Reorganized Debtors on or before December 4, 2020.” *Order* at para. 4. The United States files this response to comply with this requirement.

The United States identifies the following claims as United States Claims under the Order.

Agency	Claim No.	Amount
United States Forest Service (USFS)	59493	\$1,973,925.39
USFS	59662	\$9,895,433.65
USFS	59664	\$21,029,700.59
USFS	59712	\$19,466,029.49
USFS	63837	\$76,554,779.75
National Park Service (NPS)	63092	\$3,763,144.49
NPS	63748	\$14,170.15
NPS	63756	\$90,415.07
Bureau of Land Management	62632	\$81,167.00
Western Area Power Administration	17112	\$2,281,500.00

Date: December 3, 2020

Respectfully submitted,

JEFFREY BOSSERT CLARK  
Acting Assistant Attorney General  
Civil Division  
DAVID L. ANDERSON (CABN 149604)  
United States Attorney

---

<sup>1</sup> Terms not otherwise defined herein shall have the meaning ascribed to them in the Order.

1                                    /s/ Matthew J. Troy  
2                                    RUTH A. HARVEY  
3                                    Director  
4                                    KIRK MANHARDT  
5                                    Deputy Director  
6                                    MATTHEW J. TROY  
7                                    Senior Trial Counsel  
8                                    Attorneys for the United States

9                                    **CERTIFICATE OF SERVICE**

10                                  I hereby certify that on December 3, 2020, I electronically filed the foregoing Response with the Clerk  
11                                  of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF  
12                                  participants.

13                                   /s/ Matthew J. Troy  
14                                   Matthew J. Troy  
15                                   Senior Trial Counsel  
16                                   Attorney for the United States  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28